

**STATE OF SOUTH CAROLINA  
PUBLIC SERVICE COMMISSION  
COLUMBIA**

**DOCKET NO. 2012-218-E**

<b>In the Matter of</b>	)	
<b>Application of South Carolina Electric &amp; Gas</b>	)	<b>First Set of Discovery</b>
<b>Company for Adjustments in the Company's</b>	)	<b>Requests of</b>
<b>Electric Rate Schedule and Tariffs and Request</b>	)	<b>Time Warner Cable Inc.</b>
<b>For Mid-Period Reduction in Base Rates for Fuel</b>	)	

Pursuant to 26 S.C. Code Ann. Regs 103-833 of the South Carolina Code of Regulations, Time Warner Cable Inc. ("TWC") respectfully requests that South Carolina Electric & Gas Company ("SCE&G") answer the interrogatories and produce the documents as indicated below within twenty (20) calendar days of receipt of this request for production and all other discovery request which the following request applies.

1. SCE&G is requested to provide one copy of all responses to this request  
to :

Brian W. Coughlan, PE  
Utility Management Services, Inc.  
1221 Floral Parkway, Suite 208  
Wilmington, NC 28403  
BCoughlan@UtilManagement.com

Also, with respect to all calculation provided in response to a discovery request, please provide the electronic format with all formulae and links intact.

A copy of this request has been sent to the Chief Clerk of the Public Service Commission of South Carolina.

### First Set of Discovery Request

**CUSTOMER-RELATED COSTS.** The following questions relate to the customer-related costs for customers. If any requested data is not available in the exact manner or format requested, please provide whatever relevant data that may be helpful to determine an approximation of the data that was requested. Please include any and all assumptions, estimates and variables used to develop the data that is provided. Please provide all data in electronic format with all formulae and links in tact

#### REQUEST 1-1:

Please provide the average secondary service length that was used in the cost of service studies for overhead service for the average customer receiving service under Rate 16.

#### REQUEST 1-2:

Please provide the average secondary service conductor size and type that was used in the cost of service studies for overhead service for the average customer receiving service under Rate 16.

#### REQUEST 1-3:

Please provide the fully loaded cost on a per-foot basis of procuring and installing the secondary service conductor referenced in the request above.

#### REQUEST 1-4:

Please provide the average cost/foot to procure the rights-of-way for secondary service conductors for customers on Rate 16 who receive overhead secondary service.

#### REQUEST 1-5:

Please provide the average cost/foot to clear the rights-of-way for secondary service conductors for customers on Rate 16 who receive overhead secondary service.

#### REQUEST 1-6:

Please provide the average annual cost/foot to maintain the rights-of-way for secondary service conductors for customers on Rate 16 who receive overhead secondary service.

#### REQUEST 1-7:

Please provide the percent of customers who receive overhead service on Rate 16 who require a secondary service “lift pole” or other distribution pole to facilitate delivering the secondary service to the customer. If this percentage is not available, please provide the maximum secondary service length that SCE&G would typically run for a customer on Rate 16 before needing to install a secondary lift pole.

REQUEST 1-8:

Please provide the average secondary service length that was used in the cost of service studies for underground service for the average customer receiving service under Rate 16.

REQUEST 1-9:

Please provide the average secondary service conductor size and type that was used in the cost of service studies for underground service for the average customer receiving service under Rate 16.

REQUEST 1-10:

Please provide the fully loaded cost on a per-foot basis of procuring and installing the secondary service conductor referenced in the request above.

REQUEST 1-11:

Please provide the average cost/foot to procure the rights-of-way for secondary service conductors for customers on Rate 16 who receive underground secondary service.

REQUEST 1-12:

Please provide the average cost/foot to clear the rights-of-way for secondary service conductors for customers on Rate 16 who receive underground secondary service.

REQUEST 1-13:

Please provide the average annual cost/foot to maintain the rights-of-way for secondary service conductors for customers on Rate 16 who receive underground secondary service.

REQUEST 1-14:

Please provide the overall weighted average annual cost/foot to procure rights-of-way, clear rights-of-way, procure all materials and install the materials to provide secondary service to all customers, whether receiving overhead or underground service, receiving service on Rate 16.

REQUEST 1-15:

Please provide the estimated percent of customers on Rate 16 who receive their service from underground service conductors.

REQUEST 1-16:

Other than Cable TV (CATV) power supplies, please list any customer types that are served under Rate 16 that typically build their facilities wholly within the existing overhead primary distribution rights-of-way of SCE&G.

REQUEST 1-17:

Please provide the average secondary service length to serve the typical CATV power supply.



REQUEST 1-18:

Please provide the typical overhead secondary service conductor size and type that is used to serve the typical CATV power supply (600 watt single phase 120 volt load).

REQUEST 1-19:

Please provide the fully loaded cost/foot to procure and install the secondary conductors referenced above.

REQUEST 1-20:

Please provide the typical underground secondary service conductor size and type that is used to serve the typical CATV power supply (600 watt single phase 120 volt load).

REQUEST 1-21:

Please provide the fully loaded cost/foot to procure and install the secondary service conductors referenced above.

REQUEST 1-22:

Please provide the typical average cost to procure rights-of-way to provide secondary service to a CATV power supply located within the existing primary distribution right-of-way of SCE&G.

REQUEST 1-23:

Please provide the typical average incremental cost to clear the right-of-way to provide service to a CATV power supply located within the existing primary distribution right-of-way of SCE&G. This is the cost above and beyond the cost that SCE&G will already incur to maintain the right-of-way for their existing distribution facilities.

REQUEST 1-24:

Please provide the typical average monthly cost from the cost of service studies to procure, install, read, and create a bill for the typical time differentiated meter that is used to serve the average customer on Rate 16.

REQUEST 1-25:

Please provide the typical average monthly cost from the cost of service studies to procure, install, read, and create a bill for the typical meter of the type that is used to provide service to customers under the Experimental Uniform Load Provision under Rate 16. If this data is not available from the cost of service studies, please provide an estimate of this cost.

REQUEST 1-26:

Please describe any differences between reading a time-differentiated meter that would be used to serve the average customer on Rate 16 compared the reading the typical meter used to provide service to customers under the Experimental Uniform Load Provision under Rate 16. Is either

meter type read remotely through a communications link of some kind? Is either type meter required to be read by a meter reader who actually visits the meter?

REQUEST 1-27:

Please provide the approximate percent of CATV power supplies that required the installation of a separate transformer installed solely for the purpose of serving the CATV power supply.

REQUEST 1- 28:

Please provide the approximate percent of CATV power supplies that required that an existing distribution transformer be increased in size to accommodate the incremental load required to serve a new CATV power supply.

REQUEST 1-29:

Please provide a list of three specific service addresses and account numbers for CATV power supplies that required a separate transformer to be installed to serve the CATV power supply or required that a distribution transformer be increased in size because of the addition of a CATV power supply.

REQUEST 1-30:

Please provide a description of the material differences between the meter that is used to provide service to the typical customer receiving service under SCE&G's Rates 1, 2, 6 or 8 and the typical customer receiving service under the Experimental Uniform Load Provision under Rate 16. Is there a cost difference between these two meters? If so, what is the difference and what is the basis for that difference?

REQUEST 1-31:

Please provide the typical secondary service conductor size and type that is used to provide overhead service to residential customers. Please provide the fully loaded cost/foot to procure and install that service conductor.

REQUEST 1-32:

Please provide the typical secondary service conductor size and type that is used to provide overhead service to customers under SCE&G's Rates 1, 2, 6, 7 or 8. Please provide the fully loaded cost/foot to procure and install that service conductor.

REQUEST 1-33:

Please provide the typical secondary service conductor size and type that is used to provide underground service to residential customers. Please provide the fully loaded cost/foot to procure and install that service conductor.

REQUEST 1-34:



Please provide the typical secondary service conductor size and type that is used to provide underground service to customers receiving service under SCE&G's Rates 1, 2, 6, 7 or 8. Please provide the fully loaded cost/foot to procure and install that service conductor.

REQUEST 1-35:

Please provide the typical secondary service length to serve the average residential customer.

REQUEST 1-36

Please provide the typical secondary service length to serve the average customer receiving service under SCE&G's Rates 1, 2, 6, 7 or 8.

REQUEST 1- 37:

Please provide the typical overall cost to procure the right-of-way for the secondary service to provide service to the average residential customer.

REQUEST 1- 38:

Please provide the typical overall cost to procure the right-of-way for the secondary service to provide service to the average customer receiving service under SCE&G's Rates 1, 2, 6, 7 or 8.

REQUEST 1- 39:

Please provide the overall average monthly customer-related cost to provide service to the average customer on Rate 16. Please provide details, formulas and all other data to support this cost estimate. (This includes the costs of items of investment and related expenses in the meter investment and expenses, customer accounting and sales expense, investment and expenses related to secondary lines and services, and a portion of investment expenses related to transformers. See Direct Testimony of John R. Hendrix of behalf of South Carolina Electric & Gas Company – Docket No 2012-218-E for additional information about all cost items that should be included in this estimate.)

REQUEST 1- 40:

Please provide the overall average monthly customer-related cost to provide service to the average customer on the Experimental Uniform Load Provision under Rate 16. Please provide details, formulas and all other data to support this cost estimate. (This includes the costs of items of investment and related expenses in the meter investment and expenses, customer accounting and sales expense, investment and expenses related to secondary lines and services, and a portion of investment expenses related to transformers. See Direct Testimony of John R. Hendrix of behalf of South Carolina Electric & Gas Company – Docket No 2012-218-E for additional information about all cost items that should be included in this estimate.)

REQUEST 1- 41:

Please provide the overall average monthly customer-related cost to provide service to the average customer on Rate 6. Please provide details, formulas and all other data to support this cost estimate. (This includes the costs of items of investment and related expenses in the meter investment and expenses, customer accounting and sales expense, investment and expenses

related to secondary lines and services, and a portion of investment expenses related to transformers. See Direct Testimony of John R. Hendrix of behalf of South Carolina Electric & Gas Company – Docket No 2012-218-E for additional information about all cost items that should be included in this estimate.)

REQUEST 1-42:

Please provide copies of any cost of service study performed or created by SCE&G since January 1, 2011. Cost of service studies include any report related to the annual or monthly cost to serve any class of customer (e.g., residential, commercial, industrial, municipal) or any customers receiving service under the same rate (e.g., Rates 6, 9, 16) including items such as investment and related expenses in the meter investment and expenses, customer accounting and sales expense, investment and expenses related to secondary lines and services, and a portion of investment expenses related to transformers. (See Direct Testimony of John R. Hendrix of behalf of South Carolina Electric & Gas Company – Docket No 2012-218-E for additional information about all cost items that should be included in this estimate.)

DEMAND RELATED COSTS

REQUEST 1 – 43:

Please provide the average monthly demand related costs per KVA (or costs per kW) to serve a 600 Watts customer that operates 24 hours/day, 365 days/year, is located within the SCE&G distribution right-of-way, and is located within 15 feet of an existing primary distribution pole with an existing transformer serving other customers on the SCE&G system under the Experimental Uniform Load Provision under Rate 16. Provide details supporting this data.

REQUEST 1- 44:

Please provide the average monthly demand related costs per KVA (or costs per kW) to serve the average customer on the SCE&G system under Rate 16. Provide details supporting this data.

REQUEST 1- 45:

Please provide the average monthly demand related costs per KVA (or costs per kW) to serve the average customer on the SCE&G system under Rate 6. Provide details supporting this data.

REQUEST 1-46:

What is the average monthly demand (in KW or KVA) of a customer receiving service under SCE&G's Rate 6?

REQUEST 1-47:

What is the average monthly demand (in KW or KVA) of a residential customer?

REQUEST 1-48:

What is the average monthly demand and average on-peak demand (in KW or KVA) of a customer receiving service under SCE&G's Rate 16?



REQUEST 1-49:

What is the average monthly demand and average on-peak demand (in KW or KVA) of a customer receiving service under SCE&G's Experimental Uniform Load Provision under Rate 16?

ENERGY RELATED COSTS

REQUEST 1-50:

Please provide the average hourly energy cost per kWh to provide energy to the average customer on Rate 16.

REQUEST 1-51:

Please provide the average hourly energy cost per kWh to provide energy to a small uniform load with a 100% load factor such as a customer receiving service under SCE&G's Experimental Uniform Load Provision under Rate 16?

OTHER

REQUEST 1-52:

Identify all persons who participated in the preparation of the Answers and Responses to this First Set of Discovery Request.

REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

REQUEST 1-53:

Please provide all documents or things consulted by you in preparation of your Answers and Responses to this First Set of Discovery Request.

REQUEST 1-54:

Please provide all documents or things identified or referred to in your Answers and Responses to this First Set of Discovery Request.

Respectfully submitted, this the 17<sup>th</sup> day of October, 2012.

HAMLET & ASSOCIATES, PLLC

  
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### CERTIFICATION OF SERVICE

I certify that a copy of the Petition to Intervene by Time Warner Cable Inc. in Docket No 2012-218-E has been served by depositing a copy in the United States mail, postage prepaid, addressed to the parties of record.

This, the <sup>th</sup> 17 day of October, 2012.



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